

REMARKS

Applicants respectfully request favorable reconsideration of this application, as amended.

By this Amendment, Applicants have amended Claims 14, 23, 24, and 28 as discussed in detail below. Claims 15 and 16 have also been amended for consistency and clarity of expression. Claims 1-13, 18, and 20 were previously cancelled without prejudice or disclaimer. Thus, Claims 14-17, 19 and 21-33 are pending.

In the Office Action, Claims 14-17, 19, 21-25, and 27-33 were rejected under 35 U.S.C. § 102(e) over U.S. Patent Publication No. 2002/0002452 to Christy et al. (“*Christy*”); and Claim 26 was rejected under 35 U.S.C. § 103(a) over *Christy* in view of U.S. Patent No. 5,974,443 to Jeske (“*Jeske*”).

Without acceding to the rejections, independent Claim 14 has been amended to recite, *inter alia*, retrieving, from a markup document, localization information associated with a localization tag, wherein the localization information is associated with a language and includes an optional default localization value. It is apparent that *Christy* fails to teach or suggest the above-noted features of amended independent Claims 14.

For example, *Christy* discloses using “tags” to characterize elements in an XML document, wherein the elements may include “grammatical structures, identifiers for different meanings of the same word or word-concept, and other attributes (e.g., a set of expansion rules or allowed sentence structures) useful in performing translation.” see *Christy*, para. [0058]. None of the elements disclosed by *Christy* teach or suggest an optional default localization value. Moreover, *Christy* fails to provide a teaching or suggestion that the “other attributes” can be construed as the claimed optional default localization value. As such, *Christy* fails to teach or suggest at least the above-described

feature of amended Claim 14. Thus, Applicants respectfully submit that amended Claim 14 distinguishes patentably from *Christy*.

Further, independent Claims 23 and 24 have also been amended to recite, *inter alia*, that the associated localization information includes an optional default localization value. Therefore, Claims 23 and 24 are also believed to distinguish patentably from *Christy* for at least the reasons discussed above with respect to Claim 14.

In addition, Claims 27 and 28 were rejected along the same rationale as independent Claim 14. (*See* Office Action at 6.) Claim 14, however, does not include the limitation “proposing entry of a default value of said tag,” as recited in Claim 27. As such, it appears that the Office Action has not addressed each and every limitation of Claim 27. Therefore, Applicants respectfully submit that the rejection of Claim 27 is improper.

Furthermore, *Christy*’s disclosed tags comprised of elements in an XML document do not teach or suggest Applicants’ method that includes the step of “proposing entry of a default value of said tag” (emphasis added) as recited in Claim 27. Thus, Therefore, Applicants respectfully submit that *Christy* fails to teach or suggest at the above described feature of Claim 27.

Independent Claim 28 has been amended to include the above-quoted feature of Claim 27. Claim 28, therefore, is allowable for at least the reasons discussed above with respect to Claim 27. Moreover, Claims 32 and 33 are believed to be allowable due to their respective dependence from Claims 27 and 28 as well as for the additional feature recited in Claims 32 and 33.

The secondary reference *Jeske*, for its part, apparently fails to cure the above-discussed deficiencies of *Christy*, nor does the Office Action rely on *Jeske* for this


teaching. Thus, Claims 15-17, 19, 21, 22, 25, 26, 29, 30, and 31 are believed to be allowable based on their respective dependence from independent Claims 14, 23, and 24, as well as for the respective features recited in Claims 15-17, 19, 21, 22, 25, 26, 29, 30, and 31.

In view of the foregoing, Applicants respectfully submit that independent Claims 14, 23, 24, 27, and 28, and their respective dependents, distinguish patentably from the applied references. Therefore, Applicants respectfully submit that this application is in condition for allowance. A Notice of Allowance is respectfully requested.

Should the Examiner believe that any further action is necessary to place this application in better form for allowance, the Examiner is invited to contact Applicants' representative at the telephone number listed below.

The Commissioner is hereby authorized to charge to Deposit Account No. 50-1165 (T2147-907643) any fees under 37 C.F.R. §§ 1.16 and 1.17 that may be required by this paper and to credit any overpayment to that Account. If any extension of time is required in connection with the filing of this paper and has not been separately requested, such extension is hereby requested.

Respectfully submitted,

By: 
Edward J. Kondracki
Reg. No. 20,604

April 2, 2007

Eric G. King
Reg. No. 42,736

Miles & Stockbridge, P.C.
1751 Pinnacle Drive
Suite 500
McLean, Virginia 22102-3833
(703) 903-9000